

**POLICY UPLC 05**

**WHISTLEBLOWER PROTECTION POLICY**

**UPPER PENINSULA LAND CONSERVANCY**

Adopted the 12th day of January, 2010

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**Purpose**

Upper Peninsula Land Conservancy (“Conservancy”) is committed to lawful and ethical behavior in all of its activities. As such, the Conservancy requires its employees and Directors to observe high standards of business and personal ethics and act with honest and integrity when conducting their duties and responsibilities on behalf of the Conservancy. The purpose of this Policy is to require disclosure of all illegal or unethical conduct in connection with the Conservancy’s finances or other aspects of its operations, and to describe the methods for employees and Directors to promptly alert the Conservancy regarding these matters.

**I. Reporting Required**

**A. What to Report**

All employees and Directors of the Conservancy must promptly report in compliance with this Policy any of the following situations of which an employee or Director becomes aware or has reason to believe may exist:

1. violations of any applicable federal, state or local law or regulation;
2. violations of any material policy of the Conservancy, for example the Conflict of Interest Policy;
3. any questionable or improper matters regarding bookkeeping, accounting, internal accounting controls, or auditing matters; or
4. inappropriate handling or resolution of any complaint or matter previously reported under this Policy.

An activity is subject to reporting under this Policy regardless of whether or not such activity is within the scope of the employee’s or a Director’s official duties on behalf of the Conservancy.

**B. How to Report**

Reports under this Policy must be made to either the President or the Secretary. Additionally, at the employee’s discretion and if the circumstances warrant, reports may be made directly to any of the Conservancy’s Directors. Reports may be made in a way that identifies the reporter or anonymously, at the discretion of the reporting employee or Director.

**C. Handling of Reports**

Reports under this Policy will be taken seriously and investigated promptly. The Conservancy will maintain the confidentiality of reports to the extent feasible in light of its need to investigate and take applicable corrective action. Appropriate corrective action, up to and including termination of

employment, will be taken if warranted by the investigation into the reported conduct or for violations of this Policy.

## II. Retaliation Prohibited

No employee nor Director, may take any action that is harmful to another employee or Director, including any action to discharge, demote, suspend, threaten, harass or in any manner discriminate against an employee in the terms and conditions of employment because of any lawful act done by the employee:

1. to report any matter that the employee or Director reasonably believes must be reported under this Policy;
2. to participate in an investigation by a regulatory authority, law enforcement agency, member or committee of Congress, or any person with supervisory authority over the employee or who has the authority to investigate reports under this Policy;
3. to report truthful information relating to any state or federal offense to a law enforcement officer;
4. to provide information, cause information to be provided, or otherwise assist in an investigation regarding any conduct which the employee or Director reasonably believes constitutes a violation of applicable law or fraud, when the investigation is brought by a governmental, regulatory, or law enforcement agency, a member or committee of Congress, a person with supervisory authority over the employee, or such other person working for the Conservancy who has the authority to investigate, discover, or terminate improper conduct.

Any employee or Director who has reason to believe that he or she has been subject to retaliation for making a report or participating in an investigation under this Policy must immediately report such alleged retaliation in accordance with section I.A. and I.B. of this Policy. Any employee or Director who retaliates against another employee or Director for making a report or participating in an investigation under this Policy will be subject to disciplinary action, up to and including termination of employment of office.